

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN

JANE DOE #1 and
JOHN DOE #2,

Plaintiffs,

v.

Case No. 25-cv-317-wmc

KRISTI NOEM, in her official capacity as
Secretary of Homeland Security; *et al*,

Defendants.

**DEFENDANTS' BRIEF IN SUPPORT OF MOTION TO DISMISS
PURSUANT TO FED. R. CIV. P. 12(b)1**

Defendants hereby move for dismissal of the Complaint pursuant to Fed. R. Civ. P. 12(b)(1) because this Court lacks subject matter jurisdiction over this action.

This motion is based on the record and the accompanying declarations and Defendants' Memorandum in Support of Motion to Dismiss Pursuant to Fed. R. Civ. P. 12(b)(1).

For the reasons set forth therein, Defendants respectfully requests that the Court dismiss Plaintiffs' claims with prejudice.

Dated July 31, 2025.

Respectfully submitted,

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By:

/s/Barbara L. Oswald

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CERTIFICATE OF SERVICE

I certify that on May 1, 2025, electronically filed the foregoing document with the Clerk of the Court by using the CM/ECF system, which will provide electronic notice and an electronic link to this document to all attorneys of record.

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